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JUN 20 2024

KEVIN P. WEIMER, Clerk
By: SB Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
DIVISION

Hashem Alshehri
(Print your full name)

Plaintiff *pro se*,

v.

Delta Airlines

(Print full name of each defendant; an
employer is usually the defendant)

Defendant(s).

CIVIL ACTION FILE NO.

1:24-CV-2692

(to be assigned by Clerk)

PRO SE EMPLOYMENT DISCRIMINATION COMPLAINT FORM

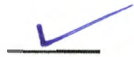
Claims and Jurisdiction

1. This employment discrimination lawsuit is brought under (check only those that apply):



Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., for employment discrimination on the basis of race, color, religion, sex, or national origin, or retaliation for exercising rights under this statute.

NOTE: To sue under Title VII, you generally must have received a notice of right-to-sue letter from the Equal Employment Opportunity Commission ("EEOC").



Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 et seq., for employment discrimination against persons age 40 and over, or retaliation for exercising rights under this statute.

NOTE: To sue under the Age Discrimination in Employment Act, you generally must first file a charge of discrimination with the EEOC.



Americans With Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq., for employment discrimination on the basis of disability, or retaliation for exercising rights under this statute.

NOTE: To sue under the Americans With Disabilities Act, you generally must have received a notice of right-to-sue letter from the EEOC.

Other (describe) _____

2. This Court has subject matter jurisdiction over this case under the above-listed statutes and under 28 U.S.C. §§ 1331 and 1343.

Parties

3. Plaintiff. Print your full name and mailing address below:

Name Hashem Alshehri
Address 3902 Tree Mountain Pkwy
Stone Mountain, GA, 30083

4. Defendant(s). Print below the name and address of each defendant listed on page 1 of this form:

Name Delta Air lines
Address Atlanta ATL

Name _____
Address _____

Name _____
Address _____

Location and Time

5. If the alleged discriminatory conduct occurred at a location different from the address provided for defendant(s), state where that discrimination occurred:

6. When did the alleged discrimination occur? (State date or time period)

2022-2024

Administrative Procedures

7. Did you file a charge of discrimination against defendant(s) with the EEOC or any other federal agency? ☒ Yes ☐ No

If you checked "Yes," attach a copy of the charge to this complaint.

8. Have you received a Notice of Right-to-Sue letter from the EEOC?

☒ Yes ☐ No

If you checked "Yes," attach a copy of that letter to this complaint and state the date on which you received that letter:

6/6/2024

9. If you are suing for **age discrimination**, check one of the following:

☐ 60 days or more have elapsed since I filed my charge of age discrimination with the EEOC

☐ Less than 60 days have passed since I filed my charge of age discrimination with the EEOC

10. If you were employed by an agency of the State of Georgia or unsuccessfully sought employment with a State agency, did you file a complaint against defendant(s) with the Georgia Commission on Equal Opportunity?

_____ Yes

_____ No

_____ Not applicable, because I was not an employee of, or applicant with, a State agency.

If you checked "Yes," attach a copy of the complaint you filed with the Georgia Commission on Equal Opportunity and describe below what happened with it (i.e., the complaint was dismissed, there was a hearing before a special master, or there was an appeal to Superior Court):

11. If you were employed by a Federal agency or unsuccessfully sought employment with a Federal agency, did you complete the administrative process established by that agency for persons alleging denial of equal employment opportunity?

_____ Yes

_____ No

☒ Not applicable, because I was not an employee of, or applicant with, a Federal agency.

If you checked "Yes," describe below what happened in that administrative process:

Nature of the Case

12. The conduct complained about in this lawsuit involves (check only those that apply):

☐ failure to hire me
☐ failure to promote me
☒ demotion
☐ reduction in my wages
☐ working under terms and conditions of employment that differed from similarly situated employees
☒ harassment
☒ retaliation
☒ termination of my employment
☒ failure to accommodate my disability
☐ other (please specify) _____

13. I believe that I was discriminated against because of (check only those that apply):

☒ my race or color, which is Arab
☒ my religion, which is Muslim
☐ my sex (gender), which is _____ male _____ female
☒ my national origin, which is Saudi Arabia
☐ my age (my date of birth is _____)
☒ my disability or perceived disability, which is:

HIV, PTSD,

my opposition to a practice of my employer that I believe violated the federal anti-discrimination laws or my participation in an EEOC investigation

other (please specify) _____

14. Write below, as clearly as possible, the essential facts of your claim(s). Describe specifically the conduct that you believe was discriminatory or retaliatory and how each defendant was involved. Include any facts which show that the actions you are complaining about were discriminatory or retaliatory. Take time to organize your statements; you may use numbered paragraphs if you find that helpful. Do not make legal arguments or cite cases or statutes.

I was admitted to the hospital due to my HIV complications for 2 weeks in 2022, after returning to work it became clear my managers were not happy and started giving me hard time I was not paid and was marked as show for one week that I worked. in 2023 employees started calling me names such as "The bug guy" by Agent Aron, and Gaty made a statement that I am from Saudi and a terrorist must be under watch and that I shouldn't work for airlines shortly after a manager named Anderson demoted me after I just qualified for the position placing his friend in. Managers use Agents to do the harassment for them, Agent Peter made fun of my Religion and Agent Andy state that my Religion is wrong both harass me in ways such as playing anything in Arabic then insult the language, I was told that we come to the us to recruit criminals, after I complained to HR in 2023 nothing changed harassment increased managers faked my attendance record and was taken against my will by my manager Mr. Suck to an office out of the work station not telling me where is he taking me I was investigated as a terrorist with inappropriate questions such as why do I hold Pilot license, why do I want to be a pilot.

(Attach no more than five additional sheets if necessary; type or write legibly only on one side of a page.)

and if I send money to Saudi Arabia, do I talk to people in Saudi
do I plan to apply for Pilot Job with Delta. Then I was suspended
without pay and fired in Jan/11/2024

My manager Sue took me down from a position I applied for
and used my credentials to reject the offer.

I was not paid for most overtime and I was missing payments

I was discriminated against my protected status, national origin
religion, sexual orientation, and medical status. after meeting

with Mr. Sue and showing him my doctor note about how this
situation caused me PTSD and severe depression thinking

he will help me move to a different department, instead.

I was retaliated and fired.

15. Plaintiff ☐ still works for defendant(s)
☒ no longer works for defendant(s) or was not hired

16. If this is a disability-related claim, did defendant(s) deny a request for reasonable accommodation? ☒ Yes ☐ No

If you checked "Yes," please explain: I presented

my manager with my doctor note, but he didn't
like what it says. also asked for ~~FMLA~~
FMLA but was told I can't apply before one
year.

17. If your case goes to trial, it will be heard by a judge unless you elect a jury trial. Do you request a jury trial? ☐ Yes ☐ No

Request for Relief

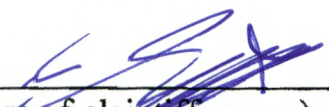
As relief from the allegations of discrimination and/or retaliation stated above, plaintiff prays that the Court grant the following relief (check any that apply):

- ☐ Defendant(s) be directed to _____
- ☒ Money damages (list amounts) \$300,000
- ☒ Costs and fees involved in litigating this case
- ☒ Such other relief as may be appropriate

PLEASE READ BEFORE SIGNING THIS COMPLAINT

Before you sign this Complaint and file it with the Clerk, please review Rule 11 of the Federal Rules of Civil Procedure for a full description of your obligation of good faith in filing this Complaint and any motion or pleading in this Court, as well as the sanctions that may be imposed by the Court when a litigant (whether plaintiff or defendant) violates the provisions of Rule 11. These sanctions may include an order directing you to pay part or all of the reasonable attorney's fees and other expenses incurred by the defendant(s). Finally, if the defendant(s) is the prevailing party in this lawsuit, costs (other than attorney's fees) may be imposed upon you under Federal Rule of Civil Procedure 54(d)(1).

Signed, this 20 day of 6, 20 24


(Signature of plaintiff *pro se*)

Hashem Alshehri
(Printed name of plaintiff *pro se*)

3902 Tree Mountain Pkwy
(street address)

Stone Mountain GA, 30083
(City, State, and zip code)

hashem.alshehri@yahoo.com
(email address)

678-750-3352
(telephone number)



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Atlanta District Office
100 Alabama Street, SW, Suite 4R30
Atlanta, GA 30303
1-800-669-4000
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 06/06/2024

To: Mr. Hashem Alshehri
3902 Tree mountain pkwy
STONE MOUNTAIN, GA 30083
Charge No: 410-2023-12316

EEOC Representative and email: STEVEN GARCIA-REYES
Investigator
steven.garcia-reyes@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 410-2023-12316.

On behalf of the Commission,

Digitally Signed By: Darrell E. Graham
06/06/2024

Darrell E. Graham
District Director



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Atlanta District Office

100 Alabama Street, SW, Suite 4R30
Atlanta, GA 30303
Intake Information Group: 800-669-4000
Intake Information Group TTY: 800-669-6820
Atlanta Direct Dial: (470) 531-4760
FAX (404) 562-6909/6910
Website: www.eeoc.gov

June 5, 2024

Hashem Alshehri
3902 Tree Mountain Parkway
Stone Mountain, Georgia 30083

RE: Hashem Alshehri v. Delta Air Lines, Inc.
EEOC Charge Number: 410-2023-12316

Greetings:

After a careful and thorough review of your correspondence and the existing file material, it is not likely that further investigation would yield evidence sufficient to show that a violation occurred. Therefore, it has been determined that no further action is warranted, and your charge will be dismissed.

You will receive a dismissal notice that describes your right to pursue this matter further by filing a lawsuit in federal court within 90 days of your receipt of the dismissal notice. **If you fail to file a lawsuit within the statutory 90-day period, your right to sue in federal court will expire and cannot be restored by the EEOC.** We hope this information is helpful and regret there is nothing further we can do in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven R. Garcia-Reyes", is located below the "Sincerely," text.

Steven R. Garcia-Reyes
Senior Federal Investigator

CC:
N/A